

DATA PROTECTION POLICY

Version 1.1

March 2014

OVERVIEW

The Royal Borough of Greenwich needs to collect personal information about people with whom it deals with, in order to carry out its business and provide its services. Such people include customers, employees (present, past and prospective), suppliers and other business contacts.

In addition, we may occasionally be required to collect and use certain types of such personal information to comply with the requirements of the law. No matter how it is collected, recorded and used (e.g. on a computer or on paper) this personal information must be dealt with properly to ensure compliance with the Data Protection Act 1998.

The lawful and proper treatment of personal information held by Greenwich Council is extremely important to the success of our business and in order to maintain the confidence of our employees and customers, we must ensure that this authority treats personal information lawfully and correctly.

PRINCIPLES OF THE DATA PROTECTION ACT

We support fully and comply with the eight principles of the Act which are summarised below:

1. Data shall be processed fairly and lawfully.
2. Data shall be obtained/processed for specific lawful purposes.
3. Data held must be adequate, relevant and not excessive.
4. Data must be accurate and kept up to date.
5. Data shall not be kept for longer than necessary.
6. Data shall be processed in accordance with rights of data subjects.
7. Data must be kept secure.
8. Data shall not be transferred outside the EEA unless there is adequate protection.

MEETING OUR RESPONSIBILITIES

Greenwich Council will:

- Ensure that there is always one person with overall responsibility for Data Protection.
- Provide awareness for all staff members who handle personal information.
- Provide clear lines of report and supervision for compliance with Data Protection.
- Carry out regular checks to monitor and assess new processing of personal data and to ensure Greenwich Councils notification to the Information Commissioner is updated to take account of any changes in processing of personal data.

All employees will, through appropriate training and responsible management:

- Observe all forms of guidance, codes of practice and procedures about the collection and use of personal information.
- Understand fully the purposes for which Greenwich Council uses personal information.
- Collect and process appropriate information, and only in accordance with the purposes for which it is to be used by Greenwich Council to meet its business needs or legal requirements.
- Ensure the information is destroyed (in accordance with the provisions of the Act) when it is no longer required.
- On receipt of a request from an individual for information held about them by or on behalf of the Royal Borough of Greenwich, immediately notify:

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Head of Governance, Systems Performance and Customer Experience
3rd Floor
The Woolwich Centre
35 Wellington Street
Woolwich
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SE18 6HQ

- Not send any personal information outside of the United Kingdom without the authority of their manager.
- Ensure the information is correctly input into the authority's systems.

DEALING WITH SUBJECT ACCESS REQUESTS

As defined within the Data Protection Act 1998, The Royal Borough of Greenwich charges a fee of £10 for processing any request for personal data, known as a Subject Access Request. Cheques should be made payable to **“The Royal Borough of Greenwich”**.

The only exception to this charge is for cases involving children or young people who are being or have been looked after by the Council.

Proof of identity is also required and it is requested that at least two copies of identifying documents of the data subject are enclosed with the request; one of these needs to be a driving licence or a passport, along with a recent utility bill or equivalent (a document detailing your current name & address). If a third party is making the request, a signed letter of consent from the data subject should also be enclosed.

Some Subject Access Requests may require further information before the process can commence. This information will be requested as soon as possible after the original request has been made. If this information is not received within 6 months, the request will be closed and a new request will have to be made.

A Subject Access Request application form has been made available but any requests in writing will be accepted providing the above the criterion has been met.